

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Lindsay Cooper (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO THEIR
MOTION TO COMPEL RESPONSES TO
INTERROGATORIES AND
PRODUCTION OF DOCUMENTS (DKT.
684)**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Administrative Motion To File Under
7 Seal Exhibits To Their Motion To Compel Responses To Interrogatories And Production Of
8 Documents (Dkt. 684) (“Sealing Motion”). Waymo supports the Sealing Motion to the extent that it
9 seeks an order sealing the following exhibits designated by Plaintiff:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 1A	Highlighted Portions	Plaintiff
Exhibit 3	Highlighted Portions	Plaintiff
Exhibit 6	Highlighted Portions	Plaintiff
Exhibit 18	Entire Document	Plaintiff
Exhibit 21	Highlighted Portions	Plaintiff

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15 3. Exhibit 1A is Uber’s First Set of Requests for Production. The Requests contain
16 descriptions of Waymo’s trade secrets, disclosure of which would be injurious to Waymo.

17 4. Exhibit 3 is Waymo’s Responses to Uber’s First Set of Requests for Production.
18 Waymo’s Responses contain descriptions of Waymo’s trade secrets, disclosure of which would be
19 injurious to Waymo. Waymo will file concurrently herewith an unredacted (highlighted) version
20 identifying the portions that describe Waymo trade secrets, and a corresponding redacted version of
21 Exhibit 3.

22 5. Exhibit 6 is Waymo’s Responses to Uber’s First set of Interrogatories. Waymo’s
23 Responses contain descriptions of Waymo’s trade secrets, disclosure of which would be injurious to
24 Waymo. Waymo’s responses also contain detailed descriptions of Waymo’s internal and confidential
25 developmental processes and thinking, which if publicly disclosed would be injurious to Waymo
26 because disclosure would reveal details of Waymo’s highly confidential LiDAR development.
27 Waymo will file concurrently herewith an unredacted (highlighted) version identifying the portions
28 that describe Waymo trade secrets, and a corresponding redacted version of Exhibit 6.

